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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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In Propria Persona
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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

Anthony Camboni

Plaintiff

v.

**STATE OF ARIZONA; MARICOPA
 COUNTY; et al**

Defendants

**CASE NO.: CV-19-05091-PHX-SPL
 SECOND AMENDED COMPLAINT
 (1.) DECLARATORY RELIEF
 (2.) VIOLATION OF UNITED
 STATES CONSTITUTION -
 AMENDMENT XIV - DUE PROCESS
 (3.) VIOLATION OF ARIZONA
 CONSTITUTION - ARTICLE II.
 DECLARATION OF RIGHTS 4.
 DUE PROCESS OF LAW
 (4.) VIOLATION OF ARIZONA
 CONSTITUTION - ARTICLE II.
 DECLARATION OF RIGHTS 21.
 FREE AND EQUAL ELECTIONS**

Respectful Demand For Jury Trial

I. INTRODUCTION

1. Anthony Camboni ("Plaintiff"), brings this Complaint against the above-named Defendants, and in support thereof alleges the following upon information and belief. This is a civil rights action demanding declaratory and injunctive relief, and monetary damages from Defendants for depriving Plaintiff of civil rights, due

process, and elective office. Plaintiff brings this case against Defendant State of Arizona, and Defendant Maricopa County, as means to receive relief, and prevent Defendants, and Officers / Employees / Agents of same, from engaging in conduct violative of the Constitution for the United States, and the Constitution for the State of Arizona. Plaintiff's Second Amended Complaint substantially complies with Federal Rules of Civil Procedure.

Haines v. Kerner, 404 U.S. 519 (1972)

"Allegations such as those asserted by petitioner, however inartfully pleaded, are sufficient"... "which we hold to less stringent standards than formal pleadings drafted by lawyers."

Jenkins v. McKeithen, 395 U.S. 411, 421 (1959); Picking v.

Pennsylvania R. Co., 151 Fed 2nd 240; Pucket v. Cox, 456 2nd 233
"Pro se pleadings are to be considered without regard to technicality; pro se litigants' pleadings are not to be held to the same high standards of perfection as lawyers."

Maty v. Grasselli Chemical Co., 303 U.S. 197 (1938)

"Pleadings are intended to serve as a means of arriving at fair and just settlements of controversies between litigants. They should not raise barriers which prevent the achievement of that end. Proper pleading is important, but its importance consists in its effectiveness as a means to accomplish the end of a just judgment."

NAACP v. Button, 371 U.S. 415); United Mineworkers of America v. Gibbs, 383 U.S. 715; and Johnson v. Avery, 89 S. Ct. 747 (1969)

 2. Plaintiff respectfully demands a jury trial. Plaintiff's respectful demand

1 for jury trial is supported by the Constitution for the United States - Amendment VII.

2 ----

3 **Amendment VII - United States Constitution**

4 In suits at common law, where the value in controversy shall exceed
 5 twenty dollars, the right of trial by jury shall be preserved, and no
 6 fact tried by a jury, shall be otherwise reexamined in any court of
 7 the United States, than according to the rules of the common law.

8 ----

9 **II. JURISDICTION AND VENUE**

10 3. This action, in which the State of Arizona, and Maricopa County, are
 11 Defendants arises under the Constitution and laws of the United States, and the
 12 Constitution and laws of the State of Arizona. Jurisdiction is conferred upon this
 13 Court pursuant to 42 U.S.C. § 1983, and 28 U.S.C. § 1331. This Court also has
 14 jurisdiction pursuant to 28 U.S.C. § 1343, because Plaintiff seeks damages for
 15 violation of civil rights.

16 4. Plaintiff's claims for declaratory and injunctive relief are authorized
 17 by 28 U.S.C. § 2201(a), 28 U.S.C. § 2202, Rules 57 and 65 of the Federal Rules of
 18 Civil Procedure, and by the general legal and equitable powers of this Court. Venue
 19 is proper under 28 U.S.C. § 1391(b). Plaintiff's respectful demand for jury trial is
 20 authorized by FRCP Rule 38.

21 5. This Court has supplemental jurisdiction over related state law claims
 22 pursuant to 28 U.S.C. § 1367(a), because those claims form part of the same case or
 23 controversy under the Constitution for the United States - Article III. Plaintiff's state
 24 law claims share all common operative facts with Plaintiff's federal law claims, and
 25 the parties are identical.

26 6. Venue is proper in, and Defendants are subject to, the jurisdiction of
 27 this Court, because Defendants maintain facilities and operations in this District,
 28 and all events giving rise to this action occurred in this District.

III. NATURE OF THE CASE

7. Plaintiff is entitled to receive rights set forth in the Constitution for the United States, and the Constitution for the State of Arizona. This case seeks to protect, and vindicate, Plaintiff's rights. This action is brought under:

- (a.) The Fourteenth Amendment to the Constitution for the United States;
- (b.) Article II. Section 4. of the Constitution for the State of Arizona;
- (c.) Article II. Section 21. of the Constitution for the State of Arizona.

Plaintiff is entitled to receive the aforementioned rights. Plaintiff was denied the aforementioned rights. Plaintiff was denied the Office of Arizona Attorneys' General, despite receiving the highest number of legal votes cast in the November 06, 2018 General Election for the Office of Arizona Attorneys' General.

8. The Fourteenth Amendment to the Constitution for the United States extends the protection of due process to all state governments, agencies, and courts. Defendant State of Arizona, and Defendant Maricopa County, violated Plaintiff's Fourteenth Amendment right to due process.

9. Article II. Section 4. of the Constitution for the State of Arizona extends the protection of due process of law to the people of the State of Arizona. Defendant State of Arizona, and Defendant Maricopa County, violated Plaintiff's right to due process of law.

10. Article II. Section 21. of the Constitution for the State of Arizona extends the right to free and equal elections to the people of the State of Arizona. Defendant State of Arizona, and Defendant Maricopa County, violated Plaintiff's right to free and equal elections.

11. Officers / Employees / Agents of Defendant State of Arizona, and Defendant Maricopa County failed to act in accordance with provisions set forth in the Constitution for the United States, and the Constitution for the State of Arizona. Same have committed acts under color of law with the intent, and for

1 the purpose of depriving Plaintiff of rights secured under the Constitution for the
2 United States, and the Constitution for State of Arizona. Officers / Employees /
3 Agents of Defendant State of Arizona, and Defendant Maricopa County, failed to
4 prevent such deprivations. Plaintiff's complaint results from violation of Federal
5 and State rights. Defendants have engaged in conduct, which violates Federal and
6 State constitutions. Defendants have abused, and denied, judicial process.

7 12. Plaintiff files this lawsuit to stop Defendants' misconduct, and denial of
8 judicial process. Plaintiff seeks financial compensation commensurate with pay and
9 benefits provided to Arizona's Attorneys' General. Plaintiff seeks compensatory,
10 exemplary, and treble damages. Defendants' actions were done intentionally, and
11 with malice, or such reckless disregard for the rights of Plaintiff, such that malice
12 can be presumed, thus making this claim appropriate for punitive damages. Plaintiff
13 demands an award of compensatory, exemplary, treble, and punitive, damages, so as
14 to punish and discourage Defendants from engaging in such conduct in the future.
15 Plaintiff seeks declaratory, and injunctive relief. Plaintiff will present evidence and
16 testimony supportive of Plaintiff's allegations.

17 **IV. PARTIES**

18 13. Plaintiff, Anthony Camboni, is a King, and an Ambassador of The
19 Creator's Kingdom. Plaintiff resides in Maricopa County / State of Arizona.

20 14. Defendant State of Arizona is the 48th state operating under the
21 Constitution for the United States, and the Constitution for the State of Arizona. The
22 State of Arizona is the State in which the filing of Plaintiff's 12/04/2018 Contest of
23 Election was wrongfully denied.

24 15. Defendant Maricopa County is the Arizona County in which the filing
25 of Plaintiff's 12/04/2018 Contest of Election was wrongfully denied.

26 16. Plaintiff is informed and believes, and thereon alleges, that at all times
27 relevant herein, Defendants were responsible in some manner for the occurrences
28 and injuries alleged in Plaintiff's Second Amended Complaint.

V. STATEMENT OF FACTS

17. Plaintiff was a Candidate for the Office of Arizona Attorneys' General in the State of Arizona's November 06, 2018 General Election. Plaintiff received the highest number of legal votes cast in the November 06, 2018 General Election for the Office of Arizona Attorneys' General. Plaintiff was denied the Office of Arizona Attorneys' General, despite receiving the highest number of legal votes.

18. December 04, 2018 Plaintiff **attempted to file** a Contest of Election in Maricopa County Superior Court, concerning the outcome of the November 06, 2018 General Election for the Office of Arizona Attorneys' General. A Maricopa County Superior Court Judge issued a December 04, 2018 RULING **denying Plaintiff's right to file** Plaintiff's Contest of Election. Denial of Plaintiff's right to file Plaintiff's Contest of Election deprived Plaintiff of rights. Plaintiff's Contest of Election **was not "dismissed"** by a Maricopa County Superior Court Judge. **Dismissal of Plaintiff's Contest of Election did not occur, because the filing of Plaintiff's Contest of Election was denied.**

19. The December 04, 2018 RULING **denying Plaintiff's right to file** Plaintiff's Contest of Election includes the following text:

"IT IS ORDERED denying Anthony Camboni's Respectful Application Pursuant to Court Order seeking Leave to File. As a result, Mr. Camboni may not file the Contest of Election submitted with his Application." (emphasis added)

20. It is not possible for a Court to dismiss an action, which was not filed. A Maricopa County Superior Court Judge prevented Plaintiff from filing the Contest of Election. Preventing the filing of the Contest of Election deprived Plaintiff of rights set forth in the Constitution for the United States, and the Constitution for the State of Arizona. Defendants are responsible for damage resulting from deprivation

1 of Plaintiff's rights.

2 **VI. INJUNCTIVE RELIEF ALLEGATIONS**

3 21. No plain, adequate, or complete remedy at law is available to Plaintiff
4 to redress wrongs alleged herein. If this Court does not grant injunctive relief
5 sought, Plaintiff will be irreparably harmed.

6 **FIRST CAUSE OF ACTION**

7 **Declaratory Relief Pursuant to 28 U.S.C. § 2201 and 28 U.S.C. § 2202**

8 22. Plaintiff incorporates allegations in preceding paragraphs as if fully set
9 forth herein, at length.

10 23. An actual and justifiable controversy has arisen and now exists between
11 the parties herein, which requires a judicial declaration by the Court. Plaintiff contends,
12 is informed, and believes Defendants dispute one or more of the following:

13 (a.) Whether Plaintiff's right to due process - Constitution for the United
14 States - Amendment XIV - was violated;

15 (b.) Whether Plaintiff's right to due process of law - Constitution for the
16 State of Arizona - Article II. Declaration of Rights - Section 4. Due process
17 of law - was violated.

18 (c.) Whether provisions set forth in the Constitution for the United States,
19 and the Constitution for the State of Arizona, are mandatory.

20 24. Plaintiff respectfully demands this Court issue a Declaration finding
21 Defendant State of Arizona violated Plaintiff's Fourteenth Amendment right to due
22 process - Constitution for the United States - Amendment XIV.

23 25. Plaintiff respectfully demands this Court issue a Declaration finding
24 Defendant Maricopa County violated Plaintiff's Fourteenth Amendment right to
25 due process - Constitution for the United States - Amendment XIV.

26 26. Plaintiff respectfully demands this Court issue a Declaration finding
27 Defendant State of Arizona violated Plaintiff's right to due process of law -
28 Constitution for the State of Arizona - Article II - Declaration Of Rights - 4. Due

1 process of law.

2 27. Plaintiff respectfully demands this Court issue a Declaration finding
3 Defendant Maricopa County violated Plaintiff's right to due process of law -
4 Constitution for the State of Arizona - Article II - Declaration Of Rights - 4. Due
5 process of law.

6 28. Plaintiff respectfully demands this Court issue a Declaration finding
7 Defendant State of Arizona violated Plaintiff's right to free and equal elections -
8 Constitution for the State of Arizona - Article II - Declaration Of Rights - 21. Free
9 and equal elections.

10 29. Plaintiff respectfully demands this Court issue a Declaration finding
11 Defendant Maricopa County violated Plaintiff's right to free and equal elections
12 - Constitution for the State of Arizona - Article II - Declaration Of Rights - 21. Free
13 and equal elections.

14 **SECOND CAUSE OF ACTION**

15 **Violation Of United States Constitution**

16 **Amendment XIV - Due Process**

17 30. Plaintiff incorporates allegations in preceding paragraphs as if fully set
18 forth herein, at length.

19 31. Plaintiff was denied the right to due process. Acts undertaken by
20 Officers / Employees / Agents of Defendant State of Arizona, and Defendant
21 Maricopa County, caused violation of Plaintiff's right to due process - Constitution
22 for the United States - Amendment XIV.

23 -----

24 **Fourteenth Amendment - United States Constitution**

25 Section 1. All persons born or naturalized in the United States, and
26 subject to the jurisdiction thereof, are citizens of the United States
27 and of the State wherein they reside. No State shall make or enforce
28 any law which shall abridge the privileges or immunities of citizens

of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

32. A Maricopa County Judge denied Plaintiff's right to file a Contest of Election, concerning the outcome of the November 06, 2018 General Election for the Office of Arizona Attorneys' General. Plaintiff's Contest of Election was received by Maricopa County Superior Court on 12/04/2018.

33. Officers / Employees / Agents of Defendant State of Arizona, and Defendant Maricopa County, owed a duty to ensure the Constitution for the United States was enforced. Officers / Employees / Agents of Defendant State of Arizona, and Defendant Maricopa County, failed to ensure Plaintiff's right to due process was enforced, despite knowledge of Plaintiff's right to due process, and denial of Plaintiff's right to due process.

34. Defendant State of Arizona, and Defendant Maricopa County, are responsible for damage resulting from denial of Plaintiff's right to due process. Plaintiff suffered, and continues to suffer damage resulting from Defendants' violations of Plaintiff's right to due process. Plaintiff will present evidence, and testimony, demonstrating injury, and loss. Plaintiff seeks damages in an amount to be determined by and through jury trial.

THIRD CAUSE OF ACTION

Violation Of Arizona Constitution

ARTICLE II. Declaration of Rights 4. Due process of law

35. Plaintiff incorporates allegations in preceding paragraphs as if fully set forth herein, at length.

36. Plaintiff was denied the right to due process of law. Acts undertaken by Officers / Employees / Agents of Defendant State of Arizona, and Defendant Maricopa County, caused violation of Plaintiff's right to due process of law - Constitution for the

State of Arizona - Article II. Declaration of Rights 4. - Due process of law.

Constitution For The State Of Arizona

ARTICLE II. DECLARATION OF RIGHTS

4. Due process of law

Section 4. No person shall be deprived of life, liberty, or property without due process of law.

37. A Maricopa County Superior Court Judge denied Plaintiff's right to file a Contest of Election, concerning the outcome of the November 06, 2018 General Election for the Office of Arizona Attorneys' General. Plaintiff's Contest of Election was received by Maricopa County Superior Court on 12/04/2018.

38. Officers / Employees / Agents of Defendant State of Arizona, and Defendant Maricopa County, owed a duty to ensure the Constitution for the State of Arizona was enforced. Officers / Employees / Agents of Defendant State of Arizona, and Defendant Maricopa County, failed to ensure Plaintiff's right to due process of law was enforced, despite knowledge of Plaintiff's right to due process of law, and denial of Plaintiff's right to due process of law.

39. Defendant State of Arizona, and Defendant Maricopa County, are responsible for damage resulting from denial of Plaintiff's right to due process of law. Plaintiff suffered, and continues to suffer damage resulting from Defendants' violations of Plaintiff's right to due process of law. Plaintiff will present evidence, and testimony demonstrating injury, and loss. Plaintiff seeks damages in an amount to be determined by and through jury trial.

FOURTH CAUSE OF ACTION

Violation Of Arizona Constitution

ARTICLE II. DECLARATION OF RIGHTS 21. Free and equal elections

40. Plaintiff incorporates allegations in preceding paragraphs as if fully set

1 forth herein, at length.

2 41. The Constitution for the State of Arizona - Article II. Declaration of
3 Rights 21. - Free and equal elections - requires Defendant State of Arizona, and
4 Defendant Maricopa County, to ensure Arizona's elections are "*free and equal*",
5 and to ensure "*no power, civil or military, shall at any time interfere to prevent the*
6 *free exercise of the right of suffrage*".

7 -----

8 **Constitution for The State of Arizona**

9 **ARTICLE II. DECLARATION OF RIGHTS**

10 **21. Free and equal elections**

11 Section 21. All elections shall be free and equal, and no power,
12 civil or military, shall at any time interfere to prevent the free
13 exercise of the right of suffrage.

14 -----

15 42. Acts undertaken by Officers / Employees / Agents of Defendant State
16 of Arizona, and Defendant Maricopa County, caused violation of the right to free
17 and equal elections.

18 43. Plaintiff was a Candidate for the Office of Arizona Attorneys' General
19 in the State of Arizona's November 06, 2018 General Election. Plaintiff attempted
20 to file a Contest of Election, concerning the outcome of the November 06, 2018
21 General Election for the Office of Arizona Attorneys' General. Filing of Plaintiff's
22 Contest of Election was denied by a Maricopa County Superior Court Judge. The
23 aforementioned denial deprived Plaintiff of free exercise of the right of suffrage. The
24 aforementioned denial deprived Plaintiff, and the people of the State of Arizona, of
25 the right to free and equal elections. The aforementioned denial caused interference,
26 which prevented free exercise of the right of suffrage.

27 44. Defendant State of Arizona, and Defendant Maricopa County, are
28 responsible for damage resulting from denial of the right to free and equal elections.

1 Plaintiff suffered, and continues to suffer damage resulting from Defendants'
2 violations of Plaintiff's right to free and equal elections. Plaintiff will present
3 evidence, and testimony demonstrating injury, and loss. Plaintiff seeks damages in
4 an amount to be determined by and through jury trial.

5 **VII. RESPECTFUL DEMAND**

6 45. WHEREFORE, Plaintiff respectfully demands judgment against
7 Defendants, and each of them, on final trial of this cause, as follows:

8 (a.) Plaintiff respectfully demands Declaratory Relief as to the parties'
9 rights, and obligations;

10 (b.) Plaintiff respectfully demands this Court issue a declaration that
11 Defendant State of Arizona, and Officers / Employees / Agents of same
12 violated Plaintiff's rights;

13 (c.) Plaintiff respectfully demands this Court issue a declaration that
14 Defendant Maricopa County, and Officers / Employees / Agents of same
15 violated Plaintiff's rights;

16 (d.) Plaintiff respectfully demands actual, treble, punitive, and exemplary
17 damages, where appropriate in an amount to be determined at trial;

18 (e.) Plaintiff respectfully demands pre-judgment interest which is accrued
19 until time of adjudication;

20 (f.) Plaintiff respectfully demands further and other relief as this court
21 may deem just, and proper;

22 (g.) Plaintiff respectfully demands all general, special, and consequential
23 damages, to the extent permitted under each of Plaintiff's causes of
24 action;

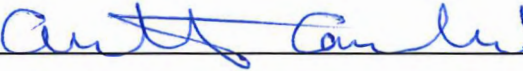
25 (h.) Plaintiff respectfully demands this Court issue an order enjoining
26 Defendants, and Officers / Employees / Agents of same, from engaging in
27 unlawful acts complained of herein;
28

1 (i.) Plaintiff respectfully demands costs associated with this action.

2 (j.) Plaintiff respectfully demands trial by jury;

3
4 DATED: 03 , 04 , 2020

5 Respectfully,

6
7 

8 Anthony Camboni

9
10 ///


1 The **ORIGINAL** of the foregoing filed this 4th day of March, 2020 with:
2 Clerk of the United States Federal Court
3 For The District Of Arizona
4 401 West Washington Street
5 Phoenix, AZ. 85003

6 A **COPY** of the foregoing to be served upon Defendants.

7 State of Arizona
8 1275 West Washington Street
9 Phoenix, Arizona 85007-2926

10 Maricopa County
11 301 West Jefferson Street, Suite 800
12 Phoenix, Arizona 85003

13
14 Anthony Camboni
15 King, Ambassador Anthony Camboni, Esq.
16 P.O. Box 5565
17 Sun City West, Arizona
85376

18  03, 04, 2020
19 Anthony Camboni Date
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